

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:) Bankruptcy No. 16-24213 CMB
Kevin R. Schade)
)
 Debtor(s))
)
) Chapter 13
Kevin R. Schade)
)
)
 Movant(s))
)
v.) Document No.
)
Ronda Winnecour, Trustee)
)
) Respondent(s))

MOTION TO APPROVE FINANCING

COMES NOW, Kevin R. Schade, by and through their attorneys, Scott R. Lowden, Esquire, and Nicotero & Lowden Legal Services, and request to incur debt, as follows:

1. Debtor(s) filed a voluntary petition for relief under chapter 13 of Title 11 of the United States Code on November 11, 2016.

2. The Debtor(s), have been offered financing by Welcome Home Finance for the purpose of purchasing a residence at 160 Charles Drive, N. Huntingdon, PA 15642.

3. The Debtor(s) wish to enter into a financing agreement for a total amount of \$279,838.00. The loan rate will be 3.25% APR for a term of 30 years, to be secured by the real estate. The proposed Estimated Loan Settlement Sheet along with the "Standard Agreement for the Sale of Real Estate" is attached as Exhibit "A".

4. The Debtors will be responsible for payment of the loan obligation outside of the Chapter 13 plan. The debtor's case is scheduled to complete in November 2021 (month 60).

5. The debtors wish to enter into the agreement to refinance the property at 160 Charles Drive, North Huntingdon, PA 15642.

WHEREFORE, the Debtors request an Order allowing the Debtor to incur post-petition debt.

Date: December 21, 2020

/s/ Scott R. Lowden
Attorney for Debtor(s)/Movant
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